

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

FIRST-CLASS MAIL AND PERIODICALS
SERVICE STANDARD CHANGES, 2021

Docket No. N2021-1

**UNITED STATES POSTAL SERVICE'S INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO AMERICAN POSTAL
WORKERS UNION WITNESS DEMATTEO
(USPS/APWU-RT2-1 TO 5)
(June 7, 2021)**

Pursuant to 39 C.F.R. § 3020.117(a), the United States Postal Service directs the following interrogatories to the American Postal Workers Union, AFL-CIO witness Stephan DeMatteo (USPS/APWU-RT2).

Respectfully submitted,

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USPS/APWU-RT2-1: On page 2 of your testimony, lines 8 to 12, you state “As part of our efforts to educate and engage postal workers and the public about the implications of the present proposed changes in service standards for First-Class Mail and Periodicals, we shared with the public the opportunity to submit comments to the Postal Service’s Federal Register Notice Request for Comments on its regulatory changes to service standards for market-dominant mail products.”

- a. Please describe in detail each of your efforts to educate and engage postal workers and the public about the implications of the proposed changes, including the method or methods used to reach the public and to whom you directed your outreach.
- b. Please describe in detail the (i) how you chose which individuals and organizations to solicit for comment, (ii) whether those individuals and organizations were solicited for the purpose of gathering information to include in your testimony, and (iii) the selection process used to identify those comments that you considered worthwhile to include in your testimony.
- c. Please describe in detail the comments received that you decided not to include in your summary of comments received, and the reason or reasons why you chose not to include them.
- d. Please describe in detail the (i) information shared with the public about how to submit comments to the Postal Service’s Federal Register Notice Request for Comments, and (ii) the methodology the APWU used to determine those individuals and organizations from which to solicit comments for inclusion in your testimony.
- e. Please produce any documents provided to the public and/or your members to educate them about the proposed service standard change, or to solicit comments, sent by any means, and including but not limited to direct mailings and/or electronic communications, educational materials, solicitations for comments, or suggested language to include in comments.

USPS/APWU-RT2-2: On page 2 of your testimony, lines 13 to 14 you state “Using an online tool, individuals can submit their comments directly to the Postal Service’s comment email address, with a copy of their message shared with the APWU.”

- a. Please describe the online tool, including its name, the software program used, any associated web address, and how it was developed to provide comments to the Postal Service with a copy of the comment sent to the APWU.
- b. Please describe how comments submitted through the online tool are conveyed to the Postal Service in response to its solicitation for comments on its proposed rule-making.

- c. Please provide documents related to the online tool, including but not limited to user manuals, guidance documents, and screen shots of the website.

USPS/APWU-RT2-3: On page 2 of your testimony, lines 15 to 17, you state, “We educated several other organizations about the service standard changes, some of whom replicated the online tool and circulated it among their members and constituents. They in turn shared the comments collected through their channels with us.”

- a. Please provide the name of each organization that you educated about the service standard changes.
- b. Please provide the name of each organization that replicated the online tool, and the email and/or website address provided to their constituents for submitting comments to the Postal Service.
- c. Please describe in detail the solicitation method or methods used by each organization to gather comments from the public for purposes of gathering information for your testimony, including whether members of any organizations and/or groups were solicited for comment and identify those organizations or groups.
- d. Please provide information on how many of the comments the APWU received came from another organization, and the number received from each organization that replicated the online tool.
- f. Please provide any documents the identified organizations provided to the public or their members to educate them about the proposed service standard change, or to solicit comments, sent by any means, including educational materials, solicitations for comments, or suggested language to include in comments.

USPS/APWU-RT2-4: On page 4 of your testimony, lines 11 to 13, and page 4, lines 1 to 2, you state, “To my knowledge, the volume and pace of comments is unusually high for such a public comment process. By comparison, for example, the December 15, 2011 Notice of Proposed Rulemaking for Service Standards for Market-Dominant Mail Products resulted in 4,200 comments in response to an Advance Notice of Proposed Rulemaking, and 101 written comments in response to the Notice of Proposed Rulemaking itself.”

- a. Please describe in detail any similar outreach measures as described in your testimony that were taken with respect to the 2011 Proposed Rulemaking, and whether the APWU utilized a similar online tool to permit individuals to submit comments directly to the Postal Service with a copy to the APWU.

- b. Please produce any documents provided to the public to educate them about the 2011 Proposed Rulemaking, or to solicit comments, sent by any means, including but not limited to direct mailings or electronic communications.
- c. If the APWU utilized a similar online tool to solicit comments in 2011, please produce any documents related to that online system including but not limited to manuals and screen shots of the website used to solicit, submit or collect comments.

USPS/APWU-RT2-5: On page 5 of your testimony, line 9, you state that the “comments were nearly unanimous,” and on lines 19-20, you state that “key themes were expressed in the comments.” For each of these statements, identify how many “comments” were received, how many were reviewed and how many you are referring to in each reference.

USPS/APWU-RT2-6: Please provide a list of each comment received by the APWU, and for each:

- a. describe any identifying information such as whether the commenter is an individual or a business; and
- b. describe any known affiliation of the commenter (e.g., whether they or an individual in their family are a member of the APWU).